## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF ILLINOIS

KATHY BRADLEY, LOIS HESS, AND KAY KLAUSNER,	) ) )
Plaintiff,	) ) CIVIL NO. 10-cv-00693-JPG-CJP
VS.	)
INNER-TITE CORP.,	) )
Defendants.	)
	)

## UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO ANSWER OR OTHERWISE PLEAD

Defendant Inner-Tite Corp., by their attorney, Rebecca M. Rothmann of Wilson, Elser, Moskowitz, Edelman & Dicker, LLP, move this Honorable Court for an enlargement of time in which to file their responsive pleading(s) to Plaintiffs' Complaint, and in support thereof state as follows:

- 1. This matter involves Plaintiffs' claims arising out of alleged false patent marking by Defendant.
- 2. According to the Court's docket, Plaintiffs filed their Complaint on September 8, 2010 and Defendant was served on September 14, 2010. Defendant's responsive pleading(s) are currently due on October 5, 2010.
- Counsel for Defendant was just recently retained and requires an additional thirty
   (30) days to investigate, gather documents, confer with Defendant, and file
   Defendant's responsive pleading(s) to Plaintiffs' Complaint.
- 4. Counsel for Defendant contacted Counsel for Plaintiffs, Judy L. Cates, on September 30, 2010, requesting an enlargement of time to file Defendant's

- responsive pleading(s), and Plaintiffs' Counsel has no objection to the requested enlargement of thirty (30) days, until November 4, 2010.
- 5. This is Defendant's first request for an enlargement of time to respond to Plaintiffs' Complaint.
- 6. This motion is brought in good faith and not to delay the proceedings in this matter. Plaintiff will not be prejudiced by the grant of an enlargement of time to answer or otherwise plead to Defendant.

WHEREFORE, Inner-Tite respectfully requests that this Honorable Court grant until November 4, 2010, thirty (30) days, to file their responsive pleading to Plaintiffs' Complaint.

Respectfully submitted,

INNER-TITLE CORP.

By: <u>/s/ Rebecca M. Rothmann</u>
One of their attorneys

Rebecca M. Rothmann Wilson, Elser, Moskowitz, Edelman & Dicker, LLP 55 W. Monroe St. Suite 3800 Chicago, IL 60602 312-704-0550 Firm I.D. 16741

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 4th of October, 2010, a copy of the foregoing pleading was filed electronically. Notice of this filing will be sent by operations of the Court's electronic filing systems to all parties indicated on the electronic filing receipt. All other parties will be served by Regular U. S. Mail. Parties may access this filing through the Court's System.

/s/ Rebecca M. Rothmann
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